

June 5, 2023

Hon. Taryn A. Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Toussie v. Williams & Connolly, LLP et al.*, No. 1:20-cv-05921-DG-TAM
(E.D.N.Y.)**

Dear Judge Merkl:

I represent Plaintiff but write this letter jointly with the other parties. The parties have completed the depositions and have also completed fact discovery, with the exception of two open issues. ***First***, the W&C defendants have sought certain limited document discovery from Michael Toussie, a third party witness who is the Plaintiff's brother. I am representing Michael Toussie for purposes of complying with this request, and we expect to produce the requested documents on or before June 16, 2023. ***Second***, the W&C defendants and Plaintiff are preparing a joint letter, pursuant to Rule 3.A of Your Honor's Individual Rules and Practices, concerning a discovery dispute over Mr. Toussie's response to interrogatories served by the W&C defendants on April 17, 2023. The W&C defendants and Plaintiff anticipate that their letter will be submitted to the Court later this week.

Respectfully submitted,

Daniel Abrams
Daniel L. Abrams